

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

**In re: William Henry Romm III
Debtor**

**Case No. 19-30155-KRH
Chapter 13**

Debtor's Address: 801 Forest Avenue
Henrico, Virginia 23229

Last Four Digits of Debtor's SSN: xxx-xx-1989

NOTICE OF MOTION TO WITHDRAW AS COUNSEL AND NOTICE OF HEARING

Counsel for the Debtor, William Henry Romm, III, has filed a Motion to Withdraw as Counsel, asking that the Court permit the Boleman Law Firm, P.C., and its lawyers to withdraw as counsel of record in this Chapter 13 case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one.

NOTICE IS HEREBY GIVEN THAT A HEARING ON THIS MOTION WILL BE HELD AT THE UNITED STATES BANKRUPTCY COURT, 701 EAST BROAD STREET, COURTROOM 5000, RICHMOND, VA 23219, ON October 7, 2020, AT 12:00 P.M.

If you want to be heard on this matter, then no later than seven (7) days prior to the date of the hearing, you or your attorney must:

1. File with the court, at the address below, a written response pursuant to Local Rule 9013-1(H). If you mail your response to the Court for filing, you must mail it early enough so that the Court will **receive** it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court
701 East Broad Street, Suite 4000
Richmond, VA 23219

2. You must also send a copy to:

Boleman Law Firm, P.C.
2104 Laburnum Ave., Suite 201
P.O. Box 11588
Richmond, VA 23230-1588

Amanda Erin DeBerry (VSB #83805)
Boleman Law Firm, P.C.
2104 W. Laburnum Avenue, Suite 201
P.O. Box 11588
Richmond, Virginia 23230-1588
Telephone (804) 358-9900
Counsel for Debtor

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an Order granting that relief.

Dated: September 23, 2020

Respectfully Submitted,
BOLEMAN LAW FIRM, P.C.

By: /s/ Amanda Erin DeBerry

Amanda Erin DeBerry (VSB #83805)
Boleman Law Firm, P.C.
2104 W. Laburnum Avenue, Suite 201
P.O. Box 11588
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Telephone (804) 358-9900
Counsel for Debtor

CERTIFICATE OF SERVICE

I certify that, on September 23, 2020, I have transmitted a true copy of the foregoing document electronically through the Court's CM/ECF system or by mail to Debtor, the Chapter 13 Trustee, the United States Trustee if other than by electronic means provided for at Local Bankruptcy Rule 2002-1, and to all creditors and parties in interest on the attached mailing matrix.

By: /s/ Amanda Erin DeBerry

Counsel for Debtor

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
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**In re: William Henry Romm III
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**Case No. 19-30155-KRH
Chapter 13**

MOTION TO WITHDRAW AS COUNSEL

Boleman Law Firm, P.C., ("Boleman") hereby respectfully requests that the Court allow Boleman and each of its respective lawyers to withdraw as counsel of record for William Henry Romm III (the "Debtor") based upon the following reasons:

1. Debtor filed this case on January 10, 2019.
2. Counsel and the Debtor are having difficulty communicating, including the provision of requested documents to the Trustee, and a fundamental difference of opinions in how the case should be handled, such that continued representation of the Debtor is difficult, if not impossible.
3. The Trustee has filed a Motion to Convert, through which certain allegations have been raised, which lead Counsel to be concerned as to the accuracy and completeness of filings in the instant case.
4. Counsel believes continued representation of the Debtor under the circumstances would be in violation of the Rules of Professional Conduct, i.e., Rule 1.2(c) and Rule 3.3(a).
5. Further, counsel believes Rule 1.16(a) requires termination of the representation and requires that counsel seek leave to withdrawal.

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Boleman Law Firm, P.C.
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Counsel for Debtor

6. Under all the circumstances of this case, Boleman Law Firm, P.C. is unable to represent the Debtor in a manner compliant with the requirements of this Court in this case, and the professional requirements set forth by the State Bar of Virginia.

7. Counsel has made every effort to avoid having to withdraw as counsel in the case, and is aware of the implications of the Debtor proceeding without counsel, particularly in the upcoming Motion to Convert. However, due to the implications of Rule 1.2(c) and (e), Counsel believes their continued representation of the Debtor in any future hearings is not in his best interests, and is in violation of the Rules of Professional Conduct.

WHEREFORE Boleman Law Firm, P.C., and its respective lawyers request that this Honorable Court enter an Order permitting the withdrawal as counsel of record and grant any further relief that the Court deems to be just and proper under the circumstances.

Respectfully Submitted,

BOLEMAN LAW FIRM, P.C.

By: /s/ Amanda Erin DeBerry

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By: /s/ Amanda Erin DeBerry
Counsel for Debtor

Andrew M. Lohmann, Esq.
Hirschler Fleischer
2100 E. Cary St., 4th Floor
Richmond, VA 23223

Capital One Bank USA
PO Box 85015
Richmond, VA 23285

Citibank
Attn: Bankruptcy Dept
Post Office Box 6062
Sioux Falls, SD 57117

Corporate Creations Network
6802 Paragon Place
#410
Richmond, VA 23230

Costen Floors, Inc.
PO Box 29468
Henrico, VA 23242

Credit One Bank
Attn: Bankruptcy
Po Box 98873
Las Vegas, NV 89193

Dankos, Gordon & Tucker, PC
1360 East Parham Road
Ste. 200
Henrico, VA 23228

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Deana Hackworth, Esq
120 Corporate Blvd
Norfolk, VA 23502

Derrick E. Rosser, P.C.
211-A England Street
Ashland, VA 23005

Eppa Hunton, Esq
Re: Massey Builder's Supply Co
6720 Patterson Ave #D
Richmond, VA 23226

Ferguson Enterprises, Inc.
12500 Jefferson Avenue
Newport News, VA 23602

Fifth Third Bank
38 Fountain Square Plz
Cincinnati, OH 45263

Gits Masonry, Inc.
2655 Rocky Oak Road
Powhatan, VA 23139

Inderpreet Singh & Saranjeet K
c/o Jaclyn E. Murphy, Esq.
10303 Memory Ln., St. 101
Chesterfield, VA 23832

Internal Revenue Service
400 N. 8th St., Box 76
Stop Room 898
Richmond, VA 23219

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

Internal Revenue Service
PO Box 7346
Philadelphia, PA 19101-7346

Internal Revenue Service
Proceedings & Insolvencies
P.O. Box 21126
Philadelphia, PA 19114-0326

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Glen Allen, VA 23060

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Harman, Claytor, Corrigan
4951 Lake Brook Drive
Glen Allen, VA 23060

Luck Stone Corporation
PO Box 29682
Henrico, VA 23242

Massey Builder's Supply Corp
2303 Dabney Road
Richmond, VA 23228

NA Partners in Anesthesia
68 S. Service Road
Suite 350
Melville, NY 11747

Pete Rose Inc
9207 Old Staples Mill Rd
Henrico, VA 23228

Petty, Livingston, Dawson & Ri
P.O. Box 1080
Lynchburg, VA 24505

Portolio Recovery Associates
PO Box 41067
Norfolk, VA 23541

Riverside Brick & Supply Compa
1200 Maury Street
Richmond, VA 23224

Ronald A. Page, Jr.
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2800 Buford Road, Suite 102
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S.B. Cox Ready Mix, Inc.
901 Potomac Street PO Box 7737
Henrico, VA 23231

Solodar & Solodar
Re: Bankruptcy
4825 Radford Ave., Suite 201
Richmond, VA 23230-3532

Superior Walls of Central VA
10101 Superior Way
Amelia Court House, VA 23002

Urbanna Builders Supply Co.
146 General Puller Hwy
Saluda, VA 23149

Verizon
500 Technology Drive
Suite 550
Saint Charles, MO 63304-2225

Virginia Dept of Taxation
P.O. Box 2156
Richmond, VA 23218

Wells Fargo Home Mortgage
3480 Stateview Blvd
Fort Mill, SC 29716